

# Exhibit A

**Defendants' Proposed Instruction**

**Use of Requests for Admission**

Evidence was presented to you in the form of admissions to the truth of certain facts. These admissions were given in writing before the trial, in response to requests that were submitted under established court procedures. You must treat these facts as having been proved.

**Source(s):** Rule 36 of the Federal Rules of Civil Procedure; Manual of Model Civil Jury Instructions for the District Courts of the Ninth Circuit (2017 ed.), Instruction No. 2.12.